

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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In the Matter of )

)  
Policies and Rules Implementing )  
the Telephone Disclosure and )  
Dispute Resolution Act )

CC Docket No. 93-22  
RM-7990

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

GTE'S COMMENTS

GTE Service Corporation, on behalf of its  
affiliated domestic telephone operating  
companies

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## SUMMARY

1. GTE actively supports the goals of the Commission and the new statute, and recommends in these comments efficient and effective ways of achieving those goals.
2. GTE urges the FCC to remain involved in the preamble requirement issue.
3. The Commission should adopt the proposal to require that only the 900 access codes are to be used for interstate PPC services.
4. GTE already complies with the prohibition against service termination for non-payment of PPC charges as proposed to include service interruptions; but it should be stressed GTE's ability to comply is dependent on Commission action limiting PPC calling to 900 for interstate and 976 for intrastate, intraLATA PPC calling.
5. Given the inability of exchange carriers to police a prohibition against collect audiotext calls, the Commission should apply the prohibition to the IPs.
6. GTE provides a blocking option across-the-board for 900 PPC services; individual 900 blocking is not economically-technically feasible.
7. GTE urges the Commission not to require inclusion of PPC service blocking in interstate tariffs.
8. Without a costly industry-wide change, exchange carriers cannot provide IP name and other IP-related information on bills; even on customer inquiry, such information can be furnished only if it has been furnished by the IXC.
9. The FCC should adopt its requirement for "show[ing] [PPC charges] on the bill separately from local and long distance telephone charges" in just those terms -- which leave precise presentation of the data to the discretion of exchange carriers. And, GTE suggests, the FCC should act preemptively to save the industry from the absurd waste of funds now occurring because of detailed requirements that vary state to state.

10. GTE is in compliance with proposals regarding protection against nonpayment of legitimate charges.
11. Any "police" requirements imposed on carriers should apply to the parties best situated to exercise control, *i.e.*, the IXC's, not the exchange carriers.
12. GTE does not believe new cost recovery mechanisms are required.
13. Verification of charitable status should be the responsibility of the IXC.

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GTE'S COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE"), in response to the Notice of Proposed Rulemaking and Notice of Inquiry, FCC 93-87 released March 10, 1993 ("*Notice*" or "*NPRM*").

BACKGROUND

In the *Notice*, the FCC proposes to prescribe rules in discharge of its statutory role under the Telephone Disclosure and Dispute Resolution Act of 1992 ("TDDRA") with respect to Pay-Per-Call ("PPC") services.

In 1991, the Commission adopted rules concerned with PPC services.<sup>1</sup> As observed in the *Notice* (at n.2), Title I of the TDDRA requires the FCC to impose regulations and requirements for common carriers offering PPC services, while the TDDRA Titles II and III direct the Federal Trade Commission ("FTC") to prescribe regulations governing the advertising and service standards of PPC services, as well as regulation of telephone-billed purchases for such services.

GTE, a Local Exchange Carrier ("exchange carrier" or "LEC"), currently does not furnish PPC services and does not enter into contracts with Information Providers ("IPs") for interstate services. Apart from the furnishing of tariffed communications services to (mainly) Interexchange Carriers ("IXCs"), GTE is primarily involved in the

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<sup>1</sup> *Policies and Rules Concerning Interstate 900 Telecommunications Services*, CC Docket No. 91-65, Report and Order, 6 FCC Rcd 6166 (1991) ("*900 Services Report and Order*"), reconsideration, FCC 93-88 (adopted February 11, 1993).

interstate PPC business as a provider of billing and collection services to IXC's that enter into contracts with IPs.

### DISCUSSION

**1. GTE actively supports the goals of the Commission and the TDDRA, and recommends in these comments efficient and effective ways of achieving those goals.**

The TDDRA and the Commission seek to protect the public from abuses while promoting those important benefits PPC services can bring to the consumer: valuable information, increased consumer choices, and the stimulation of innovative and responsive services that benefit the public.

In general, GTE already has in effect guidelines and mechanisms designed to provide fair protection to the public against abuses.<sup>2</sup> While GTE supports the thrust of the Commission's proposals, on some points -- based on its experience -- GTE suggests *infra* means to protect the public that would be less costly, more efficient, and more effective.

**2. GTE urges the FCC to remain involved in the preamble requirement issue.**

In light of the fact that the FTC is required by the TDDRA to adopt specific service standards for IPs, the *Notice* (at para. 12) proposes to defer to the FTC and thus to delete the preamble requirement contained in Section 64.711 of the Commission's Rules.

GTE suggests the Commission should not delete its preamble requirement. Among the many healthy results of the *900 Services Report and Order* is that state

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<sup>2</sup> GTE resolves disputed charges for PPC services by granting a one-time forgiveness of the charge where (i) the caller did not know there was a charge for the call; (ii) the call was placed by a minor; or (iii) the customer has no knowledge of the call ever being placed. If, after this one-time forgiveness, a subscriber fails to pay on time an additional 900 charge, GTE places mandatory 900 blocking on the subscriber's line. This mandatory blocking is used where technically feasible and where state regulatory commissions allow.

commissions have generally accepted its substance, often including matching provisions in their intrastate rules. With interstate/intrastate cooperation established in this area, GTE believes it would be beneficial if the Commission remained in the picture.

GTE stresses the importance of consistent federal and state requirements. State requirements that vary from each other and from the federal are imposing significant burdens and costs on GTE. This is made still more complex by the difficulty, or even impossibility, of distinguishing interstate from intrastate PPC traffic. The Commission's role in telecommunications goes back to 1934; the FTC is a comparative newcomer in this field. GTE believes the Commission -- in cooperation with the FTC -- can and should continue to play a constructive role in assuring consistency between federal and state requirements in relation to preambles and many other matters touched on in these comments.

**In summary:** The Commission should not delete its preamble requirement.

**3. GTE supports the proposal which would require that only the 900 access code be used for interstate PPC services.**

The *Notice* (at para. 17) says the FCC "tentatively conclude[s] that consumers' interests would be served by requiring that 900 is the only service access code that may be used for interstate [PPC] services." GTE supports this tentative conclusion.

One of GTE's main concerns is our customers' satisfaction with their telecommunications services. The use of access codes other than 900 for PPC services causes confusion and frustration for consumers. Many years of advertising have established in the mind of the consumer the belief that 800 calls are free to the caller. Consumers are coming to understand the benefits of 900 services and the associated charges. But they are often confused, surprised and resentful when they discover that they are being charged for calls placed via 700 or 800 numbers. As for

collect calls for PPC service, consumers often protest they did not realize such a charge was being incurred. In GTE's view, the best approach is to establish a clear and simple association in the consumer's mind between interstate 900 calling and PPC charges.<sup>3</sup>

For the same reasons, GTE supports the proposal of the *Notice* (at para. 29) to adopt virtually verbatim the TDDRA limitations designed to constrain the use of 800 numbers -- or any other number "advertised or widely understood to be toll free" -- for PPC purposes. GTE believes these constraints should preclude what have been called "masquerade" calls, *e.g.*, those calls to 800 numbers that (i) charge for the call, or (ii) result in the caller being called back collect to receive audio information services or simultaneous voice conversation services. The 800 number associated with such masquerade calls misleads customers into believing they are making a toll-free call. In addition to customer confusion and resentment, these masquerade calls create other potential problems:

1) Already in effect -- and reinforced by the TDDRA -- are company-originated rules and rules of state regulatory commissions that prevent disconnection of telephone service for non-payment of PPC charges. Insofar as GTE's billing systems are concerned, charges generated by the 800/900 masquerade are not identifiable as being related to PPC services. If an 800 provider uses an 800 number -- as collect call-back, credit card, Personal Identification Number ("PIN") or the like -- that ultimately results in a toll charge, **GTE's billing systems do not have the capability of distinguishing these calls from any other toll call.** The IXCs send rated toll messages to GTE for billing, but these toll messages are not distinguished by calling pattern.

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<sup>3</sup> With regard to intraLATA PPC, this should be only via a 900 NPA or 976 NXX. This comports with industry arrangements.



2) The blocking of PPC services applies to only 900 and 976 and would not limit access to 800 numbers or any kind of collect call-back to the customer. This means a customer who has ordered the blocking of PPC services might nonetheless face substantial PPC charges via the masquerade. Again, this is likely to generate customer irritation.

3) Masquerade calling represents a circumvention of the clear intent of company and regulatory policies and federal legislation.

GTE has had in effect for ten months an internal policy that the company will not knowingly bill and collect for masquerade calls. In a case where GTE unknowingly bills a masquerade call, it is removed from the customer's bill at his/her request. Further, under GTE's billing and collection practices, these charges are sent back to the entity originating the billing record.

Prohibiting use of 800 numbers for PPC services is very helpful to the industry, with one significant qualification: The restriction on charges on 800 numbers should not apply to special situations where any reasonable customer would expect to be charged regardless of the number called. The best example of this is calls originating with air-to-ground services or mobile cellular services. The FCC's rule should not prevent imposition of appropriate air-time charges under these carefully specified circumstances.

**In summary:** The Commission should adopt the proposal to require that only the 900 access code are to be used for interstate PPC services.

**4. With regard to service interruption or disconnection for nonpayment of PPC charges, GTE stresses it cannot distinguish PPC calls unless they are placed via 900 or 976.**

The *Notice* (at para. 20) enlarges the prohibition against terminating local or long distance service for non-payment of PPC charges to include interruption of service as well. This reflects language contained in the TDDRA. GTE has long followed the policy

of neither terminating nor "interrupting" (as the term is used by the *Notice*) network service for non-payment of PPC charges. Thus, GTE makes no objection to enlargement to include "interruptions."

However, GTE must make again in this context the point raised earlier: GTE cannot distinguish PPC calls from other toll charges if they are made via numbers other than 900 or 976. Accordingly, without realizing it, GTE might take action against a customer based at least in part on PPC charges resulting from calls placed via 700, 800 or collect calling. This reinforces the point stressed *supra*, that PPC calling should be restricted to 900 or -- for intrastate, intraLATA -- 976.

**In summary:** GTE already complies with the prohibition against service termination for non-payment of PPC charges as proposed to include service interruptions; but it should be stressed GTE's ability to comply is dependent on Commission action limiting PPC calling to 900 for interstate and 976 for intrastate, intraLATA PPC calling.

**5. Given the inability of exchange carriers to police a prohibition against collect audiotext calls, the Commission should apply the prohibition to the IPs.**

The *Notice* (at n.15) observes there have been many abuses involving audiotext collect calls. In view of this fact, and for the reasons stated *supra*, PPC charges via collect calling should be precluded along with PPC charges via 700 and 800 numbers.

But the question is this: given the reality that, as mentioned *supra*, GTE cannot distinguish collect audiotext calls, how would this be policed? Under current billing information interface arrangements with IXCs, GTE is not able to police the prohibition. Currently, the IXCs give GTE billing records of call information that is rated and ready to bill. Collect PPCs are not separately identified on these records; they appear as normal collect calls. Prohibiting termination or interruption of network service on account of collect audiotext calling, or prohibiting carrier billing for collect audiotext calling, would

be ineffective so long as the exchange carrier is unable to separate PPC calls from other perfectly legitimate collect calls. This means the Commission's action should be directed at the IPs.

**In summary:** The prohibition of collect audiotext calls should apply directly to the IPs.

**6. GTE provides a blocking option across-the-board for 900 PPC services; individual 900 blocking is not economically-technically feasible.**

In the *Notice* (at para. 22), the Commission proposes to change its Rules to reflect the specific blocking requirements of the TDDRA. Inasmuch as the statutory requirements relate to what is "technically feasible," the *Notice* (*id.*) asks for comments on "feasibility of providing ... selective options using existing technology."

GTE has in effect an internal policy that the company will make blocking services to 0+ and 1+900 and 976 numbers available, where technically and economically feasible, for end user business and residential customers. In a nutshell: The initial request for blocking will be free of charge to these subscribers; then there will be a charge for additional blocking requests.<sup>4</sup>

GTE is giving careful attention to ways to limit 900 abuse and subscriber liability without a disastrous effect on industry costs and revenues. For example, GTE is in the process of implementing the following:

1. Early warning of excessive 900 usage: An end user that reaches total 900 usage of a certain amount is automatically sent notification via a letter. When the end user's total 900 charges reach a second amount, GTE attempts to contact the end user by phone. If GTE has not been able to reach the end user after several attempts,

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<sup>4</sup> GTE's policy -- set out in n.2 *supra* -- is more liberal than the statutory requirement in that the TDDRA requires only that blocking be offered free of charge for 60 days after its implementation and also to new customers. GTE offers blocking indefinitely free of charge on the initial subscriber request.

mandatory 900 blocking is placed on the end user's line until the end user is contacted. This takes place before the end user is billed.

2. Phase II: Phase II will take these procedures a step further. GTE will provide the end user with a 900 credit limit based on past payment history. This limit will be continuously updated, taking into account current account status. Once the end user reaches his/her 900 credit limit, GTE will automatically place 900 blocking on the end user's line until the 900 portion of the bill is paid.

It is very important that exchange carriers be permitted to take action by blocking access to 900 services in case of end users' failing to pay or engaging in abusive behavior, or in case of those whose previous calling patterns indicate abuse of 900 service. The only effect of blocking is to cut access to 900 service; telephone service in all other respects continues to be available so long as the end user pays his/her telephone bills.

With reference to individual or selective 900 blocking, for GTE this is not economically-technically feasible. GTE can block intrastate intraLATA NXXs for those customers who want to block access to all 900 numbers. However, GTE's current switching methods will not permit an individual end user to select specific 900 NXX code(s) to be blocked. Any such effort would swiftly exhaust switching resources, and would prove economically and technically infeasible.

**In summary:** Individual 900 blocking is not economically-technically feasible.

**7. GTE opposes the inclusion of PPC service blocking in interstate tariffs.**

For sound reasons, the Commission did not require inclusion in interstate tariffs of blocking rates and regulations.<sup>5</sup> For the same reasons, the TDDRA's blocking service obligations should not be included in interstate tariffs.

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<sup>5</sup> See *900 Services Report and Order*, 6 FCC Rcd at 6176.

The nature of blocking and its interrelationship with local and intrastate service make state tariffing the logical and economical vehicle for implementing blocking requirements. It remains imperative that the terms of blocking requirements remain consistent between the state and interstate jurisdictions. PPC blocking is an end user service and, as such, it is appropriate that it be dealt with in the context of the tariff from which end users order their services -- the local service tariff.

The nature of blocking and its interrelationship with local and intrastate service make state tariffing the logical and economical means of implementing blocking requirements. It remains imperative that the terms of blocking requirements remain consistent between the state and interstate jurisdictions. PPC blocking is an end user service and, as such, it is appropriate that the rates and terms be included in the tariff from which end users order their services -- the local service tariff.

GTE voluntarily furnished 900 blocking service, which is now governed by federal statute and regulation and is reflected in GTE's intrastate tariffs. Inclusion of 900 blocking service in our interstate tariffs is unnecessary and would require maintenance of two sets of tariffs. This double system would offer no benefit to the end user and would increase the administrative burden.

If the FCC decides there should be 900 blocking service rules included in federal tariffs, this should be qualified to cover only cases where the exchange carrier does not have 900 blocking service rules reflected -- to the extent it is appropriate for tariff language<sup>6</sup> -- in intrastate tariffs.

In addition, most states have addressed PPC service blocking issues and exchange carriers have conformed to the distinct state rules. Developing interstate tariff language that addresses all individual state issues would be cumbersome, or even

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<sup>6</sup> To the extent blocking is merely a practice it is not appropriate for inclusion in a tariff. The blocking rates are what are suitable for tariffs.

infeasible without conforming to the most stringent state rules. If these rules are more excessive than the FCC determines necessary, then the FCC would be, in effect, promoting stricter requirements through an attempt at uniformity.

**In summary:** GTE urges the Commission not to require inclusion of PPC service blocking in interstate tariffs.

**8. Without a costly industry-wide change, exchange carriers cannot provide IP name and other IP-related information on bills; even on customer inquiry, such information can be furnished only if it has been furnished by the IXC.**

The *Notice* (at para. 37) asks whether "the name and other information about the IP [should] be included on telephone bills containing [PPC] charges."

The IXC and the exchange carrier communicate for billing purposes via Bellcore standard Exchange Message Interface ("EMI") records. Currently, there is no place on the toll detail records to place this information. In order to identify a place for this information, a very costly industry-wide change would have to be made. Further, GTE sees no need for any dispute-related information on the bill beyond the required 800 inquiry number.

Moreover, even when an end user calls GTE, the company does not have the names and addresses of the hundreds of IPs that exist -- many disappearing virtually overnight, or merging, consolidating, and so forth. It should be the responsibility of the IXC to provide that information and to keep it updated. Only if an updated listing of IPs' names and addresses has been furnished to the exchange carrier by the IXC can the exchange carrier take any responsibility for furnishing this information on customer inquiry.

**In summary:** The Commission should not require IP-related information on bills, and should recognize exchange carriers can respond to customer inquiry only based on updated information furnished by IXCs.

**9. The FCC should adopt its proposed requirement for showing PPC charges separately in terms that leave flexibility for exchange carriers and should preempt inconsistent state requirements.**

The *Notice* (at para. 37), in addressing information to be furnished by exchange carriers on bills<sup>7</sup>, speaks of requiring that charges for PPC services "be shown on the bill separately from local and long distance telephone charges." GTE has no objection to a requirement stated in these terms, *i.e.*, without specifying exactly how the information is to be shown. GTE is now incurring substantial costs because of inflexible requirements at the state level which -- unlike the FCC's proposal -- define the precise statement of the data. GTE has recently incurred more than three million dollars because of such detailed requirements issued by a single state. GTE urges the FCC (i) to address this matter in the public interest by stating the informational requirement in principle, leaving the details of format to the carrier; and (ii) to save the exchange carriers from having to waste significant funds complying with the detailed dictates of many state commissions. (GTE must deal with forty state commissions.)

**In summary:** The FCC should adopt its requirement for "show[ing] [PPC charges] on the bill separately from local and long distance telephone charges" in just those terms -- which leave precise presentation of the data to the discretion of exchange carriers. And, GTE suggests, the FCC should act preemptively to save the industry from the absurd waste of funds now occurring because of detailed requirements that vary state to state.

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<sup>7</sup> GTE currently provides the following information on the end user billing statement: 1) type of service; 2) amount of charge; 3) date, time and rating period, e.g., day, evening, weekend, of the call, and 4) duration of the call. GTE has found that providing this information in a detailed format facilitates customer understanding and verification of the charges.

**10. GTE is in compliance regarding protection against nonpayment of legitimate charges.**

As to questions raised by the *Notice* (at para. 40), GTE has procedures in place, outlined in n.2 *supra*, to protect consumers, and these procedures are working well. GTE will make a one-time adjustment of disputed charges; will offer blocking free of charge; and will make a second adjustment while imposing mandatory blocking.

When GTE cannot provide 900 services blocking, it is the responsibility of the IXC/IP to provide their own blocking. GTE's business policy states that it will not bear the uncollectible charges for PPC services; it will continue to adjust those charges when a customer refuses to pay for them.

**In summary:** GTE complies with proposals regarding nonpayment.

**11. GTE urges the Commission: (i) to be sure the appropriate party is held responsible for what is within its province; (ii) not to make exchange carriers responsible for IP compliance.**

Perhaps a model regulatory approach to responsibility is reflected in paragraph 34 of the *Notice*, where mandated procedures are imposed on "carriers who, in addition to assigning pay-per-call numbers, provide billing and collection services to IPs offering pay-per-call programs."<sup>8</sup> The carriers that perform PPC number-assignment and provide billing and collection services to IPs are the IXCs. These are also the carriers that are in a position to take responsibility for the items discussed in paragraph 34 -- furnishing disclosure statements, for example.

In contrast, the *Notice* (at para. 39) imposes certain obligations on "common carriers", *i.e.*, including exchange carriers, that could amount to ensuring IPs' compliance with federal/state laws or FCC/FTC regulations. Of course, exchange carriers will continue to cooperate with state and federal law enforcement authorities.

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<sup>8</sup> Footnote omitted.



But GTE does not enter into contracts with IPs and has no dealings with them. Common carrier responsibility for ensuring that PPC programs are in compliance with federal law or regulations should rest with the party best situated to handle that responsibility, and that means the IXC's.

**In summary:** Any "police" requirements imposed on carriers should apply to the parties best situated to exercise control, *i.e.*, the IXC's, not the exchange carriers.

**12. GTE opposes the proposal requiring new cost recovery mechanisms.**

With respect to the TDDRA prohibition on common carriers' recovering the costs of TDDRA compliance from local or long distance ratepayers, the FCC might be well-advised to reverse its viewpoint and adopt rules that focus on ensuring that rates for IP access and billing include all TDDRA compliance costs, rather than its current focus on ensuring that rates for all other services exclude such costs. The costs of creating new Part 32 accounts, Part 36 categories and Part 69 rate elements would far exceed the compliance costs being tracked.

Furthermore, these costs are not readily separable between the state and interstate jurisdictions because blocking occurs without the LEC ever knowing whether the call attempt would have been an interstate call, if completed. Technically, once the call has been blocked, there is no interstate communication regardless of the intended destination. Therefore, it is not clear what costs should be allocated to the interstate jurisdiction or removed from current interstate access services.

Should the Commission deem it necessary to provide a specific mechanism for recovery of interstate blocking costs, GTE supports the proposal of the *Notice* (at para. 44) to recover these costs from the PPC providers.

Isolating the TDDRA compliance costs could be included in any future Joint Board action on separations reform and/or access rate restructure. The public interest

would certainly not be served by expending the industry and regulatory resources to mount a special effort to address this one rather small issue.

**In summary:** GTE does not believe new cost recovery mechanisms are required.

**13. GTE supports the proposal concerning verification of charitable status.**

The *Notice* (at para. 46) suggests it is the responsibility of the IXC, as the assigner of the 900 access code, to verify "that the entity or individual for whom contributions are solicited has been granted tax exempt status by the Internal Revenue Service." GTE supports this view.

This information can be obtained easily by the IXC at the time of number assignment. On the other hand, the exchange carrier, having no direct contact with the IP, would have to initiate a contact for such verification. It is far more efficient to make the IXC responsible and it places responsibility with the party best situated to carry out the mission.

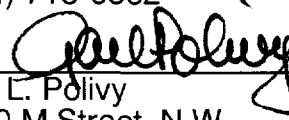
**In summary:** Verification of charitable status should be the responsibility of the IXC.

Respectfully submitted,

GTE Service Corporation, on behalf of its  
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